

REMARKS

The present amendment is in response to the Office action dated 31 July 2008, where the Examiner has rejected claims 17-37. Applicant thanks the Examiner for the courteous telephonic interview conducted with the undersigned and inventor Dietrich Schultz on 28 October 2008. In the present amendment, claim 29 has been amended to be in independent form. Accordingly, claims 17-37 are pending in the present application with claims 17, 29, and 32 being the independent claims. Reconsideration and allowance of pending claims 17-34 in view of the amendments and the following remarks are respectfully requested.

A. Interview Summary

Applicant thanks the Examiner for the courteous telephonic interview conducted with the undersigned and inventor Dietrich Schultz on 28 October 2008. During the interview, independent claim 17 was discussed. No exhibit was shown and no demonstration was conducted. The prior art references Smith, Bernardo, and Ackerman were discussed. The primary point of discussion was related to difference between the claims, which modify URLs when the location of the source document containing the URL is changed, and the prior art, which modify URLs when the location of the target document pointed to by the URL is changed. No agreement was reached during the telephonic interview.

B. 35 USC §112

Claims 32-37 stand rejected under section 112 ¶1 as failing to comply with the written description requirement. Specifically, the Examiner identified elements 2, 3 and 5 of claim 32 as including new subject matter. Below is a table demonstrating support for these elements in at least paragraphs 109-110.

Claim element	Specification support
removing said first content from said first document;	¶110 discusses editing content, including the ability to delete content

generating a second document, wherein the second document includes said first content;	¶110 discussed creating documents with content
determining a second URL corresponding to the second document;	¶109 discusses determining a second URL that is different

Based on this showing, Applicant respectfully requests that the 112 rejection be withdrawn.

C. 35 USC §103(a), Claims 17-31

In the Office Action, claims 17-37 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,684,369 (“Bernardo”) in view of U.S. Patent No. 6,606,653 (“Ackerman”) and further in view of U.S. Patent No. 6,578,078 (“Smith”). As set forth in MPEP § 2143, in *KSR International Co. v. Teleflex Inc.*, 550 U.S. ___, 127 S. Ct. 1727, 82 USPQ2d 1385, 1395-97 (2007) the Supreme Court identified a number of rationales to support a conclusion of obviousness which are consistent with the proper “functional approach” to the determination of obviousness as laid down in *Graham v. John Deere Co.*, 383 U.S. 1 (1966). The key to supporting any rejection under 35 U.S.C. 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious. The KSR Court noted that the analysis supporting a rejection under 35 U.S.C. 103 should be made explicit.

As discussed during the interview, the cited references fail to disclose modifying a URL in the source document when the location of the source document changes. The cited references only address solutions for modifying a URL in the source document when the location of the target document changes. The target document is the document to which the URL in the source document points.

More specifically, Bernardo is directed toward a template based website creation utility. Ackerman and Smith are directed toward solutions to the problem of updating URLs in a source document when the location of the target document changes (see *Ackerman*, C2,L14-22; and *Smith*, C7,L61-64). Ackerman employs a detour page

located at the old URL of the target document (C2,L40-43). Smith employs a database that tracks the changes to URLs of target documents (C8,L20-23).

What Ackerman and Smith fail to disclose is any solution to the problem of updating a URL in a source document when the location of the source document changes. Independent claim 17 is directed to a solution for this problem. Specifically, claim 17 requires the generation of a document and publication of that document to a current location. This document is a source document, using the language from the discussion above. A relative URL in the document is then identified. The relative URL points to a target document, using the language from the discussion above. A new relative URL corresponding to the relative URL in the document is then identified and the document is then modified based on the new relative URL to generate a modified document. The modified document is then published to a new location.

Thus, according to independent claim 17, the current relative URL is modified before the source document is published to a new location so that after the location of the source document is changed due to its publication to a new location, the new relative URL is a valid URL and is not broken.

Applicant asserts that the combination of Bernardo, Ackerman and Smith fail to disclose each and every element of independent claim 17. Because dependent claims 18-28 and 30-31 further refine and add elements to independent claim 17, applicant submits that claims 17-28 and 30-31 are presently in condition for allowance and a notice of allowance including claims 17-28 and 30-31 is respectfully requested.

Claim 29, which previously depended from independent claim 17, has been amended to be in independent form. Applicant asserts that independent claim 29 is also presently in condition for allowance based on the same reasons set forth above with respect to independent claim 17. Furthermore, claim 29 also requires that a second document be modified based on the modification that was determined for the first document to generate a modified second document. This requirement stands in stark contrast to Ackerman and Smith, which do not disclose any modifications to subsequent documents based on the modification to the first document. For this

additional reason, Applicant asserts that independent claim 29 is presently in condition for allowance and a notice of allowance including claim 29 is respectfully requested.

D. 35 USC §103(a), Claims 32-37

Independent claim 32 is directed toward an embodiment of the invention that facilitates maintaining the integrity of links in a document during the creation and publication process. For example, during the creation process content may often be moved from one document to another document. When the relocated content was the target of a URL within the relocated content's initial document, that URL requires updating. New claim 32 addresses this problem.

The combination of Bernardo, Ackerman and Smith do not make new claim 32 obvious. As previously discussed, Ackerman and Smith are directed toward the updating of links when target documents are moved. In contrast, claim 32 is directed toward replacing a same page link URL that points to content within the document when that content is relocated to a new document. Bernardo does not disclose updating links of any kind. Smith and Ackerman do not disclose replacing a same page link URL. In particular, Smith and Ackerman only address modification of URLs that point to target documents, and only when the target documents move. Smith and Ackerman do not even contemplate updating same page links, which by definition point to the source document itself and do not point to target documents.

Furthermore, the cited references do not disclose replacing a same page URL a variety of different types of relative links, as required by dependent claims 33 – 37. Accordingly, Applicant believes that new independent claim 32 and each of its dependent claims 33 – 37 are presently in condition for allowance and a notice of allowance is respectfully requested.

CONCLUSION

For all the foregoing reasons, allowance of pending claims 17-34 is respectfully requested. If the Examiner believes that a telephone conversation may be useful in advancing prosecution, the Examiner is invited to contact the undersigned at the number listed below. If necessary, applicant requests to extend the period for filing this reply pursuant to 37 CFR 1.136(a) and authorizes the Director to charge any additional fee(s) or any underpayment of fee(s) or credit any overpayment(s) to Procopio Deposit Account No. 50-2075.

Respectfully submitted,

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